

1 PAUL J. PASCUZZI, State Bar No. 148810
JASON E. RIOS, State Bar No. 190086
2 THOMAS R. PHINNEY, State Bar No. 159435
FELDERSTEIN FITZGERALD
3 WILLOUGHBY PASCUZZI & RIOS LLP
500 Capitol Mall, Suite 2250
4 Sacramento, CA 95814
Telephone: (916) 329-7400
5 Facsimile: (916) 329-7435
Email: ppascuzzi@ffwplaw.com
6 jrios@ffwplaw.com
tphinney@ffwplaw.com

7 ORI KATZ, State Bar No. 209561
8 ALAN H. MARTIN, State Bar No. 132301
JEANNIE KIM, State Bar No. 270713
9 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership Including Professional Corporations
10 Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
11 Telephone: (415) 434-9100
Facsimile: (415) 434-3947
12 Email: okatz@sheppardmullin.com
amartin@sheppardmullin.com
13 jekim@sheppardmullin.com

14 Attorneys for The Roman Catholic Archbishop of
San Francisco

15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 In re
18 THE ROMAN CATHOLIC ARCHBISHOP
19 OF SAN FRANCISCO,,
20 Debtors.

Case No. 23-30564

Chapter 11

**SUPPLEMENTAL DECLARATION OF
BARRON L. WEINSTEIN IN SUPPORT
OF FIRST INTERIM FEE APPLICATION
OF WEINSTEIN & NUMBERS, LLP FOR
ALLOWANCE OF FEES AND
REIMBURSEMENT OF EXPENSES AS
SPECIAL INSURANCE COUNSEL FOR
THE DEBTOR IN POSSESSION**

Date: April 18, 2024

Time: 9:30 a.m.

Place: Via ZoomGov

Judge: Hon. Dennis Montali

1 I, Barron L. Weinstein, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California and a
3 shareholder with Weinstein & Numbers, LLP (“W&N” or the “Applicant”), special corporate and
4 insurance counsel for The Roman Catholic Archbishop of San Francisco, a California corporation
5 sole, the debtor and debtor in possession in the above-captioned chapter 11 case (“RCASF” or the
6 “Debtor”).

7 2. The matters stated herein are true and correct and are within my personal knowledge
8 or information provided to me by other attorneys or employees of W&N, and if called upon to testify
9 as a witness, I could and would testify competently thereto.

10 3. This supplemental declaration is made in support of the *First Interim Fee Application*
11 *of Weinstein & Numbers, LLP for Allowance of Fees and Reimbursement of Expenses as Special*
12 *Insurance Counsel for the Debtor in Possession* (the “Application”). I give capitalized terms not
13 defined here the same meaning given to them in the Application.

14 4. The Application did not include the following information in compliance with the
15 UST Guidelines: (a) information to be provided about customary and comparable compensation;
16 and (b) information about budget and staffing plans.

17 5. Attached to this declaration as Exhibit 1 is a summary of customary and comparable
18 compensation provided by W&N describing the blended hourly rates of the various categories of
19 timekeepers that provided services to the Debtor during the Application Period. I give defined terms
20 used in this exhibit the same meanings ascribed to them in ¶ C.3 of the UST Guidelines.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27

28

1 6. Attached to this declaration as Exhibit 2 is a copy of the “Attorney Fee Budget”
2 agreed upon by and between the Debtor and W&N. This exhibit also includes a comparison of
3 budgeted to actual fees sought during the Application Period. W&N is not submitting a detailed
4 staffing plan or summary of fees and hours budgeted compared to fees and hours billed for each
5 project category as this information is privileged and confidential.

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct.

8 Executed on this 19th day of April, 2024, at San Francisco, California.

DocuSigned by:

Barry Weinstein

QTEOCA425D6249B...

Barron L. Weinstein

Exhibit 1

Summary of Customary and Comparable Compensation (UST Guidelines, Ex. A)

Category of timekeeper (using categories already maintained by the firm)	Blended hourly rate	
	U.S. Non-Bankruptcy Blended Rate	Bankruptcy Estate Blended Rate
	1/1/23-12/31-23	8/21/23-1/31/24
Sr./Equity Partner/Shareholder	\$619.62	\$625.00
Sr. Associate (7 or more years since first admission)	\$398.61	\$425.00
Jr. Associate (1-4 years since first admission)	\$356.25	\$350.00
Paralegal	\$231.18	\$253.79
Legal assistant	\$196.50	\$210.00
All timekeepers aggregated	\$379.22	\$324.86

Exhibit 2

W&N Fee Budget

Month	Aug. 2023	Sept. 2023	Oct. 2023	Nov. 2023
Fees & Expenses	\$10,000	\$50,000	\$50,000	\$50,000
Month	Dec. 2023	Jan. 2024	Total for Application Period	
Fees & Expenses	\$50,000	\$50,000	\$260,000	

Comparison of Budgeted to Actual Fees Sought During Application Period

Fees and Expenses Budgeted	Fees and Expenses Sought	Difference Between Budgeted and Actual Fees and Expenses Sought
\$260,000	\$95,539.57	\$164,460.43